

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 19-12595
Mark Nottingham	:	Chapter 13
Carolynn Nottingham	:	Judge Eric L. Frank
Debtor(s)	:	*****
	:	
Chimera REO 2018-NR1 LLC	:	
Movant	:	Place of Hearing
	:	U.S. Bankruptcy Court
v.	:	900 Market Street, Courtroom #1
	:	Philadelphia, PA, 19107
Mark Nottingham	:	
Carolynn Nottingham	:	
	:	
William C. Miller, Trustee	:	
Respondents	:	

CERTIFICATE OF DEFAULT

Now comes Chimera REO 2018-NR1 LLC, its successor and assigns (hereinafter, "Creditor"), by and through its mortgage servicing agent Nationstar Mortgage LLC d/b/a Mr. Cooper, by and through counsel, and certifies to this Court that Mark Nottingham and Carolynn Nottingham ("Debtors") have failed to comply with the Order approving the stipulation dated August 19, 2019, a copy of which is attached hereto as Exhibit "A", by failing to make timely payments in accordance with the stipulation. Pursuant to the Order, the automatic stay will terminate upon the filing of a Certificate of Default.

Creditor hereby avers that Debtors are delinquent for the February 1, 2020 payment and for all arrears that were due thereafter. Further, pursuant to the terms of the stipulation, Creditor provided Debtors and their Counsel with a Notice of Default on March 16, 2020, allowing Debtors ten (10) days to cure the default. A copy of said default letter is attached hereto as Exhibit "B". Ten (10) days have passed and the default has not been cured.

WHEREFORE, upon the filing of this Certificate of Default, Creditor requests that the Court enter an order terminating the automatic stay.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 19-12595
Mark Nottingham	:	Chapter 13
Carolynn Nottingham	:	Judge Eric L. Frank
Debtor(s)	:	*****
	:	
Chimera REO 2018-NR1 LLC	:	
Movant	:	Place of Hearing
	:	U.S. Bankruptcy Court
v.	:	900 Market Street, Courtroom #1
	:	Philadelphia, PA, 19107
Mark Nottingham	:	
Carolynn Nottingham	:	
	:	
William C. Miller, Trustee	:	
Respondents	:	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Certificate of Default was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Chapter 13 Trustee, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

Brad J. Sadek, Attorney for Mark Nottingham and Carolynn Nottingham, Sadek and Cooper,
1315 Walnut Street, Suite 502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on April 3, 2020:

Mark Nottingham, 1218 Primrose Court, Bensalem, PA 19020

Mark Nottingham and Carolynn Nottingham, 1218 Primrose Court, Bensalem, PA 19020

OneMain Financial, Attn: Bankruptcy, 601 NW 2nd Street, Evansville, IN 47708

DATE: April 3, 2020

/s/ Karina Velter
Karina Velter, Esquire (94781)

Adam B. Hall (323867)
Sarah E. Barngrover (323972)
Manley Deas Kochalski LLC
P.O. Box 165028
Columbus, OH 43216-5028
Telephone: 614-220-5611
Fax: 614-627-8181
Attorneys for Creditor
The case attorney for this file is Karina
Velter.
Contact email is kvelter@manleydeas.com